

Hearing Date and Time: December 16, 2009 at 10:00 a.m. (prevailing Eastern time)  
Objection Deadline: December 9, 2009 at 4:00 p.m. (prevailing Eastern time)

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*Bankruptcy Counsel to Lead Plaintiff in the Mortgage Backed Securities Litigation*

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re:	Chapter 11
LEHMAN BROTHERS HOLDINGS INC., <i>et al.</i> ,	Case No. 08-13555 (JMP)
Debtors.	(Jointly Administered) Relates to Docket No. 5659

**JOINDER OF THE MBS LEAD PLAINTIFF IN THE SECURITIES LEAD  
PLAINTIFFS' MOTION FOR A LIMITED MODIFICATION OF THE AUTOMATIC  
STAY**

Locals 302 and 612 of the International Union of Operating Engineers – Employers Construction Industry Retirement Trust (the “**MBS Lead Plaintiff**”), the Court-appointed lead plaintiff in the consolidated securities class action pending in the United States District Court for the Southern District of New York (the “**District Court**”) captioned *In re Lehman Brothers Mortgage Backed Securities Litigation*, Case No. 08-Civ-6762 (LAK) (the “**Mortgage-Backed Securities Litigation**”) and Plaintiff New Jersey Carpenters Health Fund (the “New Jersey Carpenters”) and Plaintiff Boilermakers-Blacksmith National Pension Trust (the “**Boilermakers**”) (the “**MBS Plaintiffs**”),<sup>1</sup> as additional named plaintiffs in the Mortgage-Backed Securities Litigation, by and through their undersigned counsel, submit this joinder in the

<sup>1</sup> On October 22, 2009, the MBS Lead Plaintiff similarly joined in the motion of the Securities Lead Plaintiffs, in *In re Lehman Brothers Equity/Debt Securities Litigation*, 08-CV-5523-LAK (S.D.N.Y. Oct. 13, 2009), seeking limited relief from the PSLRA discovery stay.

motion (Docket No. 5659) (the “**Motion**”) by Alameda County Employees’ Retirement Association, Government of Guam Retirement Fund, Northern Ireland Local Government Officers’ Superannuation Committee, City of Edinburgh Council as Administering Authority of the Lothian Pension Fund, and Operating Engineers Local 3 Trust Fund, the court-appointed lead plaintiffs (the “**Securities Lead Plaintiffs**”) in the consolidated securities class action pending in the United States District Court for the Southern District of New York captioned, *In re Lehman Brothers Equity/Debt Securities Litigation*, Case No. 08-05523 (LAK) for an order modifying the automatic stay of 11 U.S.C. § 362(a) on a limited basis to enable the Securities Lead Plaintiffs to obtain from the Debtors documents, deposition transcripts and other information that the Debtors have produced, or will soon produce, to governmental authorities and other parties concerning investigations or litigation relating to these chapter 11 cases. In support of this joinder, the MBS Plaintiffs respectfully state:

**JOINDER**

1. For the reasons and on the authority cited in the Motion, the MBS Plaintiffs join in the Motion and request that the Court Order enter an order modifying the automatic stay to the limited extent set forth in the Motion, and granting such other relief as the Court deems just and proper.

Respectfully submitted,

**LOWENSTEIN SANDLER PC**

By: /s/ S. Jason Teele  
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Dated: November 30, 2009  
New York, New York